

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems)	
And Their Impact Upon the Existing)	MB Docket No. 87-268
Television Broadcast Service)	

**To: Office of the Secretary
 Federal Communications Commission**

**PETITION FOR LEAVE TO FILE SUPPLEMENT
TO PETITION FOR RECONSIDERATION
(FOR KUSA-DT, DENVER, CO)**

Gannett Co., Inc (“Gannett”), by its attorneys and pursuant to § 1.106 of the Commission’s rules, hereby petitions for leave to file the attached supplement to its Petition for Reconsideration filed October 25, 2007 in the above-captioned proceeding (*“Initial Petition”*). The supplement provides detailed information essential to the FCC’s determination of final DTV allotment parameters for Station KUSA-DT, Denver, Colorado. KUSA-DT is one of 23 television stations indirectly owned by Gannett. As discussed in the *Initial Petition*, 11 of those stations were initially assigned a UHF DTV channel but will revert to a VHF channel at the end of the DTV transition. Shortly before the deadline for filing the *Initial Petition*, it was determined that each such station required careful engineering review to determine if it would be able to reach with its digital signal the areas served by its analog facilities. On the advice of FCC staff following meetings with Commission personnel, the *Initial Petition* was submitted with a promise to file supplemental information following a review of each station’s allotted

facilities.¹ That review has been completed for KUSA-DT and the results are provided in the attached supplement. The public interest would be served by FCC consideration of this information.

Therefore, Gannett respectfully requests grant of this Petition and acceptance of the supplemental technical showing provided in the attached Supplement to Petition for Reconsideration.

Respectfully submitted,

GANNETT CO., INC.

By: /s/ Marnie K. Sarver
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November 15, 2007

Its Attorneys

¹ On November 7, 2007, Gannett requested an additional week until November 16, 2007 to submit the supplemental information, to give its engineer sufficient time to complete the studies.

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**SUPPLEMENT TO PETITION FOR RECONSIDERATION
(FOR KUSA-DT, DENVER, CO)**

Gannett Co., Inc (“Gannett”), by its attorneys, hereby supplements its Petition for Reconsideration (“*Petition*”) filed October 25, 2007 in the above proceeding. The *Petition* noted that 11 of the 23 stations indirectly owned by Gannett, including KUSA-DT, Denver, Colorado, would require careful study to determine if the facilities allotted in the DTV Table would permit each station to serve the area served by its analog signal. The stations requiring study were, specifically, those that were allotted UHF DTV channels for their interim DTV operations and have elected to return to their analog VHF channels for post-transition operation. KUSA-DT is currently operating on DTV Channel 16 and will revert to Channel 9 at the end of the transition.

The attached Engineering Statement by Richard H. Mertz of Cavell, Mertz & Associates, Gannett’s consulting engineers (“*Engineering Statement*”), contains the results of the study of the allotted KUSA-DT facilities. Based on Mr. Mertz’s findings, Gannett respectfully requests that the allotment facilities in the DTV Table be revised to reflect those set forth in the *Engineering Statement*. The revised parameters, which

specify use of a different directional antenna pattern, will allow KUSA-DT to closely match the coverage of the KUSA-TV analog Grade B coverage and maintain service to existing analog viewers when it converts to digital operations on Channel 9. Mr. Mertz notes in the *Statement* that it would be extremely difficult to design an antenna with a directional pattern matching the directional pattern allotted in the DTV Table and would require an extreme reduction in power, with resulting loss of service. Moreover, an interference study indicates that the proposed directional facility results in no interference or reduced interference as compared to the allotment facility. Therefore, to accommodate this service improvement at KUSA-DT, Gannett requests a change in the certification made in its Form 381 to specify operation with the post-transition facilities requested herein in order to more closely replicate its analog Grade B contour. In addition, use of the proposed “real world” directional antenna will facilitate a smoother, more efficient transition to permanent digital operations at KUSA-DT.

Respectfully submitted,

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